UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,
 	
               Plaintiff,
 	
   v.
 	
SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES
NOS. 1-50.
 	
               Defendants.
	Civil Action No. 1:22-cv-00187-LJV-JJM

NOTICE OF MOTION TO COMPEL TRADE SECRET IDENTIFICATION

PLEASE TAKE NOTICE THAT, upon the accompanying Motion to Compel Trade

Secret Identification, Memorandum of Law, and Declaration of Gabriel S. Gross, together with all

exhibits, Defendant Skyryse Inc. by and through its undersigned counsel, Latham & Watkins LLP,

hereby moves this Court for an order requiring plaintiff Moog Inc. to immediately:

1. answer in full Skyryse's Interrogatory No. 1 calling for Moog to identify with par-

    ticularity every alleged trade secret it intends to assert in this action including

    through a narrative response and not solely by invoking Rule 33(d); and

2. supplement its responses to Skyryse's Interrogatory Nos. 2-9 calling for infor-

    mation regarding the trade secrets Moog discloses in response to Interrogatory

    No. 1.

In accordance with Local Rule 7(a)(1), Skyryse reserves the right to file and serve reply

papers. Skyryse respectfully requests the Court hear oral argument on Skyryse's Motion during

the conference already scheduled for July 15, 2022, or at the Court's earliest convenience, and that

opposition and reply briefing be scheduled accordingly in advance of the July 15 conference.

Dated: June 21, 2022   */s/ Gabriel S. Gross*
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